

**ISP ENVIRONMENTAL SERVICES, Inc.**

1361 Alps Road Wayne NJ 07470 - 3688

(973) 628 3000



VIA E-MAIL AND US MAIL

January 10, 2013

Mr. Jonathan Gorin  
Remedial Project Manager  
United States Environmental Protection Agency, Region II  
290 Broadway  
19<sup>th</sup> Floor  
New York, New York 10007-1866

Subject: Change in Project Coordinator  
LCP Chemicals, Inc. Superfund Site (USEPA ID# NJD079303020)

Dear Mr. Gorin:

The purpose of this letter is to notify you that Ashland has a new project coordinator for the LCP Chemicals, Inc. Superfund Site as required by the Administrative Order No. II CERCLA-02-99-2015 (hereinafter referred to as the Order) issued by USEPA and as executed by IES on May 13, 1999. Ashland's project coordinator is now:

John M. Hoffman  
Project Manager  
Ashland Inc.  
EH&S, Remediation  
500 Hercules Road  
Wilmington, DE 19808-1599  
302-995-3485  
jmhoffman@ashland.com

If you or your staff has any questions or comments, please do not hesitate to contact me at ---

Sincerely,

  
John Hoffman  
Ashland Inc.

RECEIVED  
FEB - 8 2013

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cc: S. Miller, NJDHSS  
F. Cardillo, Esq., USEPA  
D. Toft, Esq.  
A. Pavelka, NJDEP  
R. Lampkin, Ashland

C. McGowan, IES  
S. MacMillin, Brown and Caldwell  
K. Tolson, Geosyntec  
M. DeFlaun, Geosyntec  
J. Kubitz, Entrix

G. DiPippo, P.E., Cornerstone

## Delegation of Authority to Execute Remediation Related Documents

Page 1

Delagator: Keith Silverman, VP EH&S

Effective Date: December 11, 2012

Signature: 

*GRF*  
*LL*

The authority to sign submissions in connection with remediation of sites for Ashland Inc. and its direct and indirect subsidiaries (including Hercules Incorporated and International Specialty Products, Inc.) is hereby delegated to the individuals identified and in the manner specified in the following table, without the authority to redelegate.

Name of Delagatee	Category A	Category B
Gary Allen	Yes	Yes
Mark Metcalf	Yes	Yes
Michael Dever	Yes	No
Timothy Hassett	Yes	No
John Hoffman	Yes	No
J. David McNichols	Yes	No
Steven Roach	Yes	No
J. Vincent Saleski	Yes	No
James Vondracek	Yes	No

Category A consists of the authority to submit reports and other documents that certify the accuracy of factual information and do not propose actions or otherwise make commitments of reservable amounts (commitments do not exceed \$50,000). Examples include:

- Report submittals –
  - GW monitoring reports
  - Operational reports
  - Progress Reports
  - Discharge Monitoring Reports - DMR
  - Self Monitoring Reports – SMR
  - Annual/biennial hazardous waste reports
  - Water use reports
- Numerous NJDEP SRRA submissions - everything requires a submission for this program, sometimes a submission for a submission (note that the LSRP signs off on a lot of submissions)
  - <http://www.nj.gov/dep/srp/srra/forms/>
- PADEP Act 2 submittals
- NJDEP Community Notification (bi-annual)
- Residential air monitoring reports (periodic)
- SSDS Inspection Reports (annually)
- Remedial Investigation Report (investigatory results only)

## **Delegation of Authority to Execute Remediation Related Documents**

Page 2

**Category B consists of submissions to agencies and documents involving third parties that propose actions or make commitments of reservable amounts (\$50,000 or greater). A Delegatee may exercise this authority upon his determination that corporate policies and practices were followed in the preparation of the submission and he has conducted an appropriate review of the document. This delegation specifically excludes the authority to enter into obligations traditionally reserved to other functions (e.g., banking, making or receiving loans, etc. are traditionally handled through Treasury). Examples of submissions authorized include:**

- Feasibility Study Report/ CMS/ work plans
- Permit Applications
  - RCRA application including renewals
  - NPDES application including renewals
  - Air permit application including renewals
  - Some permits required for construction
- Remediation Funding Source/Financial Assurance submissions (with concurrence from Treasury)
- Access agreements (where the company is seeking access to a third party's property) (with concurrence from Law)

### **General provisions**

This delegation does not give any Delegatee any authority beyond that explicitly stated herein. In particular, it does not provide any Financial Approval Authority (FAA) in connection with any matter. All commitments/obligations must always be approved by a person with the appropriate FAA in accordance with the established practices and procedures of the company prior to exercising the authority delegated herein. In the event there is a question about whether a particular action is authorized by this delegation, the Delegatee should, before acting, seek clarification from the Law Department or the Delegator.

Each Delegatee herein designated shall be authorized to act hereunder from the effective date hereof (a) only so long as such Delegatee shall remain an employee of Ashland or any of its subsidiaries or (b) until such time as this instrument has been revoked, annulled and set aside by an instrument or revocation, or (c) December 31, 2013, whichever may first occur.